UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to: Civil File No. 18-296 (MJD/KMM)

DECLARATION OF MICHAEL D. BLATCHLEY IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER REGARDING PLAINTIFFS' THIRD-PARTY SUBPOENAS

- I, Michael D. Blatchley, declare:
- 1. I am a partner at the law firm of Bernstein Litowitz Berger & Grossmann LLP which, together with Stoll Stoll Berne Lokting & Shlachter P.C., serves as Lead Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund, named Plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009, and the proposed Class in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. I submit this declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Protective Order regarding Plaintiffs' Third-Party Subpoenas.
- 2. Attached as Exhibits A through J are true and correct copies of the following documents:

Exhibit A:		
Exhibit B:		
Exilibit D.		
Exhibit C:		
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Exhibit D:		
Exhibit E:		

Exhibit F:	AFNI, Inc. Company Profile page extracted from Dun & Bradstreet database.		
Exhibit G:	Convergent Outsourcing, Inc. Company Profile page extracted from Dun & Bradstreet database.		
Exhibit H:	Allied Interstate, LLC Company Profile page extracted from Dun & Bradstreet database.		
Exhibit I	November 1, 2018 Reuters Article titled, "Debt collector Allied settles with California Counties for \$9 mln."		
Exhibit J			

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 23rd day of July, 2020.

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

By: /s/ Michael D. Blatchley

Michael D. Blatchley, NYS Bar No. 4747424

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